

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JAMES GERADS,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 3:23-cv-03672-SMY
	)	
84 LUMBER COMPANY, a limited	)	
Partnership, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION FOR DISMISSAL OF DEFENDANT**  
**ZURN INDUSTRIES, LLC, WITHOUT PREJUDICE**

COMES NOW, Plaintiff, James Gerads, and Defendant, Zurn Industries, LLC, by and through their respective attorneys, and for their Joint Motion to Dismiss Defendant Zurn Industries, LLC, without prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(2), states as follows:

1. Plaintiff and Defendant hereby request that the Court dismiss Defendant Zurn Industries, LLC, without prejudice.
2. Dismissal of this Defendant will not prejudice any party.

WHEREFORE, Plaintiff and Defendant pray that this Honorable Court enter an Order dismissing Defendant Zurn Industries, LLC, without prejudice, with each party to bear their own costs, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**SWMW Law, LLC**

**MANNING GROSS + MASSENBURG LLP**

By: /s/ Stephanie L. Gold  
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One of the Attorneys for Defendant  
**ZURN INDUSTRIES, LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing Joint Motion was served upon all attorneys of record via the CM/ECF System on the 18<sup>th</sup> day of December, 2024.

/s/ Stephanie L. Gold